



**Prince George's County  
Office of Ethics and Accountability and  
Board of Ethics**

# **Annual Report**

## **INCLUSIVE OF CALENDAR YEAR 2023 & FISCAL YEAR 2024**

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## MESSAGE FROM THE EXECUTIVE DIRECTOR

Hon. Todd M. Turner, Esq.

August 2024



It is with great pleasure that I provide the Calendar Year 2023/Fiscal Year 2024 annual report for the Office of Ethics and Accountability (OEA) in conjunction with the Board of Ethics (BOE).

Since Fiscal Year 2015, as a result of the OEA's investigations, legal reviews, and other activities, we are providing recommendations each year to Executive and County Council Leadership to promote a culture of integrity, efficiency, and public trust. We highlighted several top Fiscal Year 2024 recommendations in this Report.

During Fiscal Year 2024, OEA continued to provide administrative support to the Board of Ethics through the collection of financial disclosure statements from County officials and employees, the registration and reporting of lobbying activities, and the continuation of regular board meetings and hearings, which were conducted virtually. There were fifteen (15) referrals of alleged ethics violations complaints referred to the Board of Ethics, of which six (6) were substantiated or partially substantiated.

This past year, OEA again collaborated with the Office of Human Resources Management (OHRM) to offer mandatory ethics training and resources to the County's workforce of more than 6,000 employees and officials. We conducted in-person and virtual trainings, including for the County Council. This Fiscal Year OEA retained Dickey & Associates, a County-Based Minority-Owned Firm, to conduct the required 5-year Quality Assurance Review under §3-309 of the County Code (provided under separate cover).

In FY 2024 the Office continued additional community outreach and education activities to inform the public of the mission of OEA and the Board of Ethics in County government. OEA worked with the Office of Human Rights' Language Access Program (LAP) training, the language access line, and translated our Information Brochure into Spanish.

Additional information and reports are available on the OEA/BOE website. I sincerely appreciate the opportunity to serve and provide increased accountability and oversight in the operations of the Prince George's County government.

Sincerely,

Todd M. Turner  
Executive Director

*“Your **A**dvice, **C**ompliance, & **E**nforcement Team”*

## Mission

The mission of the Office of Ethics and Accountability is to promote public trust in County government through:

- Providing comprehensive intake, processing, investigations, management, and adjudication of allegations of waste, fraud, abuse, and illegal acts in County government.
- Promoting disclosure of outside business and monetary interests of County government employees/officials and real-time notice of lobbying activity directed towards County government.
- Providing training, technical assistance, and public education necessary to ensure County government services are delivered with integrity and in accordance with the standards of professional conduct identified within the ethics code.

## Purpose

The Office of Ethics and Accountability provides increased accountability and oversight in the operations of the County government by identifying fraud, waste, abuse, and illegal acts pursuant to Prince George's County Code §2-299. It also provides support to the Prince George's County Board of Ethics in the exercise of its authority to interpret the County Code of Ethics in order to promote public trust in County government by ensuring the impartiality of the employees and elected officials in accordance with Prince George's County Code §2-292.

The Office of Ethics and Accountability's two main functions are best described as investigative of County operations and administrative in its support to the Board of Ethics. Investigations are initiated in several ways: (1) through the PGC Ethics Hotline, (2) directly to the Office, (3) via media, or (4) by other means. After an initial investigation by OEA, a matter may eventually be referred to law enforcement, an appropriate agency, or the Board of Ethics. Administratively, the Office of Ethics and Accountability oversees Financial Disclosure Statement submissions and lobbyists' registrations and reports; renders ethics advice to individuals governed by the Ethics Code; maintains compliance with the Open Meetings Act for the Board of Ethics; and provides ethics training to County officials, employees, and lobbyists.

### Office of Ethics and Accountability Staff

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Compliance Analyst	Kathleen Ibeh	kcibeh@co.pg.md.us	(301) 883-5331
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## MESSAGE FROM THE BOARD CHAIR

Cassandra Burckhalter



In accordance with Section 2- 292(a)(6) of the Prince George’s County Code, the Board of Ethics is required to provide an annual report of its activities to the County Executive and County Council. I am pleased to provide the Calendar Year 2023 and Fiscal Year 2024 Annual Report of the Board of Ethics (“Board”).

I am excited to report that Calendar Year 2023 and Fiscal Year 2024 included the continuation of the County’s mandatory ethics training for employees, board and commission members, and elected officials. The Office of Ethics and Accountability successfully collaborated with the Office of Human Resources Management to offer training through the County’s online learning module system NEOGOV.

Throughout the year, the Board and OEA staff continued to receive and respond to a large number of requests for ethics advice, regarding, but not limited to, conflicts of interest, gifts, political activity, secondary employment, and post-employment matters.

The Office of Ethics and Accountability continued to investigate several complaints alleging violations of the Ethics Code. Some of the complaints have resulted in the issuance of recommendations to improve County policies and procedures.

To ensure compliance with the County’s Code of Ethics, during the Financial Disclosure Statement filing season, the Office of Ethics and Accountability staff provided assistance and legal advice on electronic filings to several officials, employees, volunteer commissioners, and board members. To date, staff has received and processed approximately (1,000) Financial Disclosures Statements in Fiscal Year 2024 as well as three hundred eighty-four (384) lobbyist registration forms from eighty-four (84) total registered lobbyists in Calendar Year 2023.

The Board will continue to render advisory opinions to officials and the employees of the County and address all questions arising under the Code of Ethics, receive complaints, and authorize, when applicable, the conduct of investigations in connection with the Code of Ethics.

In my eleventh and final year of service on the Board, I want to thank my fellow Board Members for their dedicated service. I appreciated the opportunity over my terms to promote public trust in its officials and employees.

Sincerely,

A handwritten signature in black ink that reads "Cassandra Burckhalter". The signature is written in a cursive, flowing style.

Cassandra Burckhalter  
Board Chair

## **Purpose of the Board of Ethics**

The Code was enacted to guard against improper influence and even the appearance of improper influence by County officials, employees, and appointees to boards and commissions. To ensure impartiality and independent judgment, the Ethics Code requires designated individuals to disclose their financial affairs, and it sets standards for their business conduct. The Board of Ethics is the advisory body responsible for interpreting the Ethics Code and advising those persons subject to it. The Board of Ethics also serves as the body to hear and determine ethics complaints and violations.

## **Members of the Board of Ethics**

The Board of Ethics currently consists of four (4) members. Members must be a resident of Prince George's County and no more than three members may be of the same political party. Todd M. Turner serves as the Executive Director to the Board of Ethics in addition to serving as the Executive Director of the Office of Ethics and Accountability. The Board of Ethics selected Cassandra Burckhalter to serve as Chair through December 31, 2024. The remaining members are as follows: Sharon Theodore-Lewis, Esq., Member, Charlene Gallion, Member, and Melanie Barr-Brooks, Member. Board Member Mickei Milton, stepped down in February 2024, and Dr. Kara Hunt was confirmed in July 2024.

## **Meetings of the Board of Ethics**

All regular meetings were either held virtually or in the Office of Ethics and Accountability, in the Largo Government Center, 9201 Basil Court, Suite 155, Largo, Maryland 20774. As required, advance notice of meetings and the possibility of closed sessions were posted on the County's website. All decisions of the Board of Ethics are reflected in the minutes of the monthly meetings and are available on the OEA's website.

Generally, agenda topics included establishing procedures for the Board of Ethics, consideration of formal requests for advisory opinions on the application of the Ethics Code, and review of investigation reports related to alleged violations of the County's Ethics Code, many of which include recommendations to Executive Leadership in the County. The Board has submitted proposed legislation to the County Council for revisions to the County's Ethics Code disclosure requirements as part of the requirements to align with the State's Ethics Laws and to promote public trust in County government.

During the 2024 fiscal year, the Board of Ethics met nine (9) times for regular sessions, and one (1) for a hearing (open and closed) session. A notice of the meetings appeared on the County's website. The Board of Ethics conducted closed sessions to discuss advisory opinion requests, exemption requests, and Board investigation referrals. The Board of Ethics conducted open meetings for all other actions.

## **Charter §1002 Waivers**

The Board of Ethics did not receive any requests for Section 1002 waivers in the calendar year of 2023. Section 1002 of the Charter provides that the Board of Ethics may authorize any County employee to own stock or maintain a business, that engages in business with the County subject to the Board of Ethics' determination that the employee's involvement does not violate the public trust, and that there is full disclosure of all pertinent facts.

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## Board of Ethics Referrals

The Board of Ethics is empowered with authority to determine violations of the County's Ethics Code. The Board of Ethics reviews all complaints of alleged violations, conducts fact findings and hearings, and determines if an Ethics Code violation has occurred. Investigations of ethics violations completed by the Office of Ethics and Accountability are referred to the Board of Ethics for a determination of violations. Some complaints may be determined by the Board of Ethics in the following fiscal year upon completion of investigations. During the 2023 Fiscal Year, the Board received fourteen (14) referrals of alleged ethics violations which four (4) were substantiated or partially substantiated through investigations by the Office of Ethics and Accountability.

## Enforcement Activities

The Board of Ethics is empowered to impose fines and other penalties as warranted and to seek judicial enforcement of its sanctions. The Board of Ethics did not seek judicial enforcement but did impose late filing fees for delinquent filing of Financial Disclosure Statements and Lobbyists Annual Reports during the calendar year. For the 2024 Fiscal Year, OEA collected more than \$1,700 in late fees.

## Proposed Legislative Changes

Periodically, certain provisions in the Prince George's County Code will require revisions to comply with statutory changes made by the State Ethics Commission or to clarify interpretation to ensure compliance. Any proposed amendments to the Prince George's County Code of Ethics embodied in legislative proposals require approval by the State Ethics Commission in addition to an enactment by the County Council. There were no County Code legislative reviews in FY 2024. OEA also reviews, at the request of the Executive Branch, State legislative bills in the 2024 General Assembly session for potential impacts on the County Code and/or OEA operations.

## Ethics Training

The Office of Ethics & Accountability collaborated with the OHRM to offer mandatory ethics training and other ethics training resources to more than 6,000 employees, officials, and board/commission members. Between July 1, 2023, and June 30, 2024, the Office provided in-person and/or online ethics training to several agencies, boards, and commissions, including the new Police Accountability Board (PAB) and the County Council. The Office promotes ethics training and compliance through five (5) distinct training areas: new employee orientation materials, online Learning Management System training, in-person or virtual online workshops, on-site agency training by agency request, and special ethics topics training. OEA also provides monthly Countywide public service announcements on ethics topics. During FY 2024 OEA Director Turner provided two ethics training as an instructor with the University of Maryland Academy for Excellence in Local Government (AELG) for the Maryland Municipal League (MML) and participated in a regional roundtable with the District of Columbia Board of Ethics and Accountability (BEGA) as part of their "Ethics Week" program. Finally, OEA also provides monthly Countywide public service announcements on ethics topics to County officials and employees.

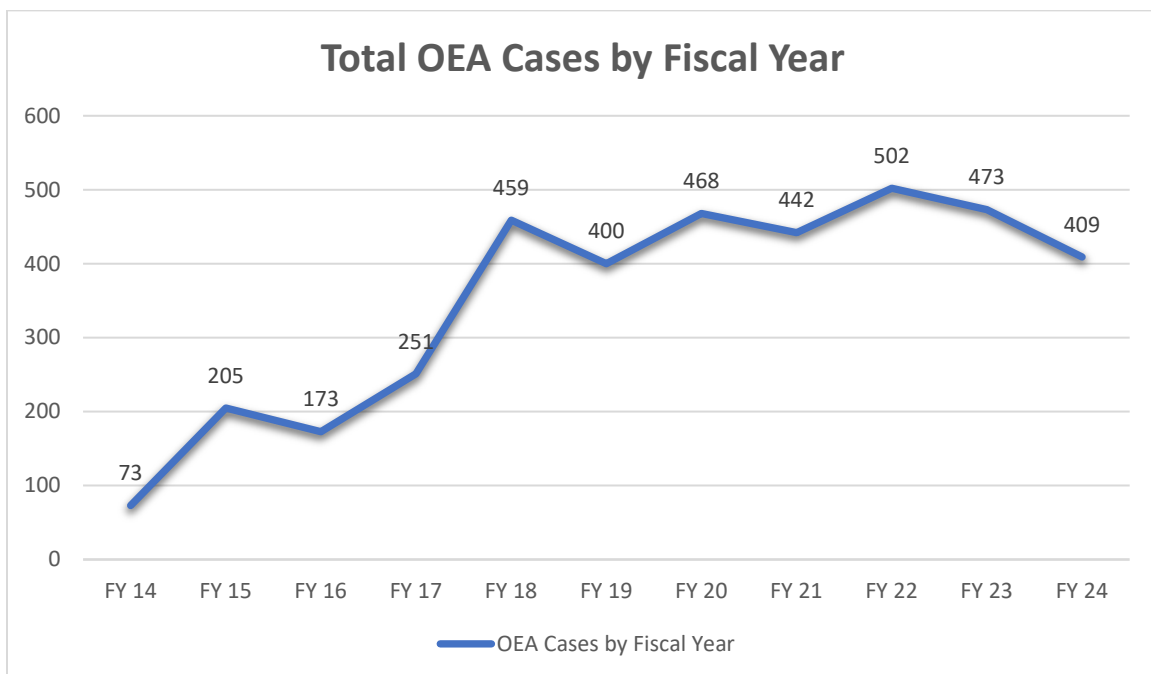




## FY2024 Key Accomplishments

The Office of Ethics and Accountability (OEA) achieved the following key milestones:

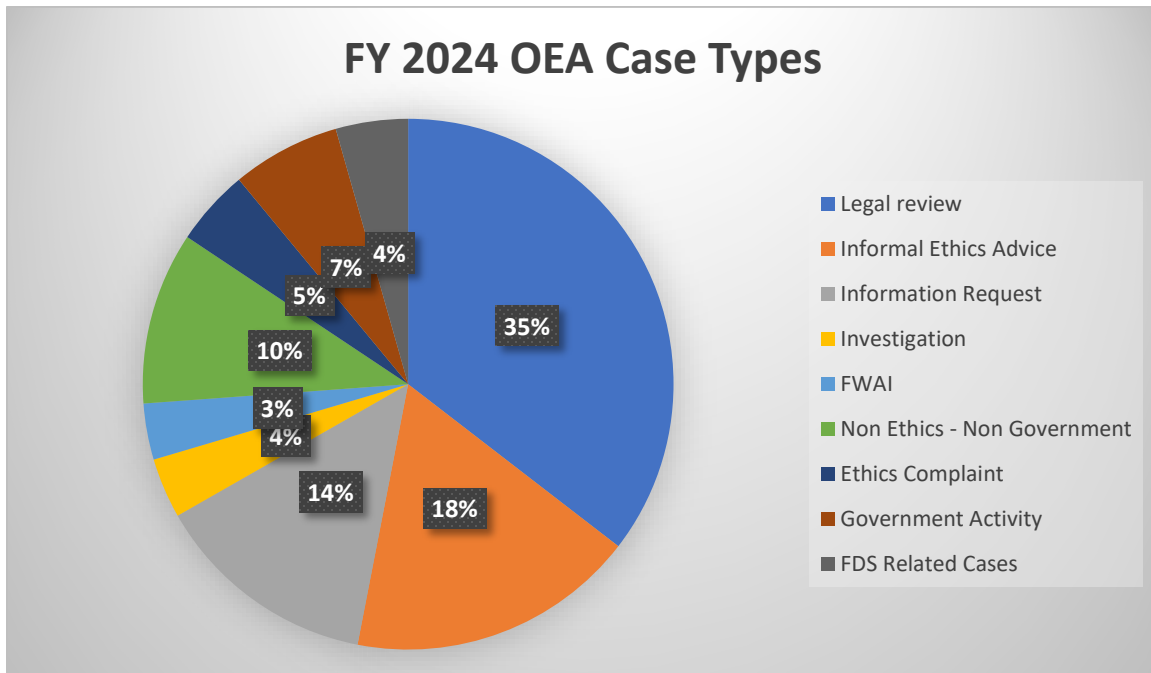
The Office of Ethics and Accountability processed four hundred nine (409) requests for the following case types in Fiscal Year 2024: investigations, operations reviews, legal reviews, advisory opinions & informal ethics advice, information requests, and financial disclosure exemptions or fee waivers – largely received electronically. The Office has seen a substantial increase in cases since its establishment in Fiscal Year 2014. Of the complaints investigated solely or jointly by the Office of Ethics and Accountability this fiscal year, six (6) cases were substantiated or partially substantiated with appropriate actions to be taken by agencies to address the identified ethics violations. Information related to Advisory Opinions, Informal Ethics Advice, and Investigations are provided on the OEA’s website.



The Office of Ethics and Accountability continues to provide ethics advice, rendering seventy-two (72) informal opinions to officials, employees, and lobbyists in Fiscal Year 2024. During Fiscal Year 2024, twenty-eight percent (28%) of the cases involved investigations, and eighteen percent (18%) involved the rendering of informal ethics advice. Legal reviews constituted another thirty-five percent (35%) of the Office’s efforts, which entailed, in part, a review of Appointments, Secondary Employment Requests, and the County and State legislation that impacted ethics laws. Information Requests comprised fourteen percent (14%) of cases and FDS Waivers or Exemptions comprised four percent (4%) of cases. OEA also carried out Operations Reviews (1%) and provided administrative support to the Board of Ethics in the interpretation of permissible activities under the County’s Ethics Code.

Most cases received by OEA in Fiscal Year 2024 were filed electronically, by phone, or via email directly to the Office, through the County’s web portal, or the Ethics hotline, allowing reporters to file complaints anonymously. The Office of Ethics and Accountability continues to utilize an online payment system for late fees and fines due from designated filers of Financial Disclosure Statements and lobbyists.





In its role of providing oversight and review of the collection of Financial Disclosure Statements (FDS) from designated filers in accordance with the County's Ethics Code, the Office of Ethics and Accountability processed over one thousand (1,000) Financial Disclosure Statements. OEA annually conducts a common error and FDS schedules audits pertaining to Schedule E (business entities employed with the County), Schedule H (other sources of income), and Schedule J (Other Interests) to determine any conflicts related to secondary employment.

The Office of Ethics and Accountability continues to partner with agencies to broaden its global ethics training initiatives, and through training, bring awareness to officials and employees on the importance of reporting ethics violations and instances of fraud, waste, abuse, illegal acts, and noncompliance with County policies. OEA Executive Director Turner conducted both virtual and in-person ethics training with the Maryland Municipal League (MML) as an instructor with the University of Maryland Academy for Excellence in Local Government (AELG). He also participated in a panel of regional ethics officials as part of the District of Columbia's Board of Ethics & Governmental Accountability (BEGA) Ethics Week in October 2023.

Other completed FY 2024 Goals:

- Completed the County Ethics Code required 5-year Quality Assurance Review (the last one was done in 2019).
- Implemented the County's Language Access Program (LAP) within OEA.
- Conducted additional community outreach and education activities.

## Major Objectives for Fiscal Year 2025

The Office of Ethics and Accountability will continue to focus on establishing processes to govern its core services of investigations, evaluation of County operations, collection of Financial Disclosure Statements for employees and officials, collection of registrations and annual reports for lobbyists, and provision of ethics training and advice to include the following:

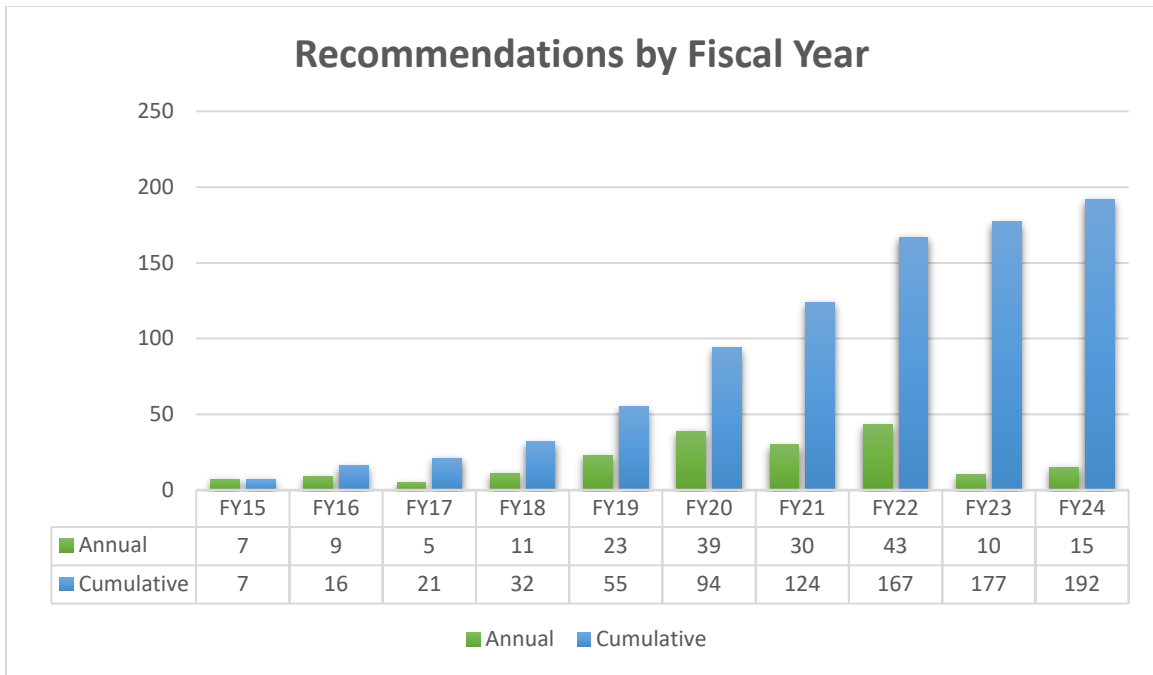
- To continue to provide comprehensive intake, processing, investigation, management, adjudication, analysis, reporting of allegations of fraud, waste, abuse, illegal acts, and operations review in County government and make necessary recommendations to executive and legislative officials to promote efficiency and accountability in County government.
- To continue to promote disclosure of the outside business and monetary interests of County government employees/officials and real-time notice of lobbying activity directed towards County government.
- To continue to provide ethics advice and legal reviews to officials and employees to ensure compliance with the County's Ethics Code.
- To implement the recommendations from the completed 5-year Quality Assurance Review.
- To update Executive Order 13-2014 which requires additional individuals and bodies to file Financial Disclosure Statements.
- Seek State and County Ethics Code clarifying legislation for State Financial Disclosure Statements (FDS) filing requirements with the County Board of Ethics/OEA in Prince George's County for Bi-County Commissions (M-NCPPC, WSSC, and WSTC) (2024 OEA Recommendation).



OEA Team doing Language Access Program training with County Office of Human Rights staff – Feb. 2024.

## Recommendations and Actions Taken

In Fiscal Year 2024, the Office of Ethics and Accountability is providing additional recommendations to Executive Management and County Council Leadership. The total number of recommendations by Fiscal Year are provided in the table below (please note: starting in FY 2023 – OEA only provided highlighted recommendations in the Annual Report).



OEA Executive Director Turner conducting the Ethics 101 training at the Maryland Municipal League Fall Conference at the Hotel in College Park – Oct. 2023.

Photo Credit: MML

## FY 2024 Highlighted Recommendations

#	Case No.	Case Details	Recommendation(s)	Date Issued
1.	N/A	N/A	Review, update, and reissue Executive Order 13-2014 – Code of Ethics §2-294 – Financial Disclosure Statement Designated Filers for Agencies, Boards & Commissions. (Continuation of 2023 Recommendation).	N/A
2.	N/A	N/A	Possible State Ethics Code clarifying legislation for State Financial Disclosure Statements (FDS) filing requirements with the County Board of Ethics/OEA in Prince George's County for Bi-County Commissions (M-NCPPC, WSSC, and WSTC)(Gen. Prov. Art. §§5-602, 5-822 — 5-832) (Continuation of 2023 Recommendation).	N/A
3.	N/A	N/A	Possible County Ethics Code §2-294(b) clarifying legislation for Bi-County Commissions (M-NCPPC, WSSC, and WSTC) to provide their State Financial Disclosure Statements (FDS) to the County Board of Ethics/OEA. (Continuation of 2023 Recommendation).	N/A
4.	23-0279e	<p><b>Case Type:</b> Procurement/FWAI</p> <p><b>Agency/B/C:</b> OCS</p> <p><b>Subject:</b> Allegation of collusion between employee and county vendor, whose submitted bid was approximately 60% higher than its second responsive vendor.</p> <p><b>Disposition:</b> Unsubstantiated</p>	<p>I. OCS to update the current policy on prevailing wage monitoring services solicitation, to include specific steps to be taken to address issues where an accepted bid is substantially higher than that of another responsive bidder</p>	11/2/23
5.	23-0315e	<p><b>Case Type:</b></p> <p><b>Agency/B/C:</b> OIT</p> <p><b>Subject:</b> Allegation that employee that OIT employee hired their brother as a contractor under their leadership/department in OIT.</p> <p><b>Disposition:</b> Unsubstantiated</p>	<p>I. Currently there is no known policy that addresses conflict of interest with new employees of agencies. OIT, in collaboration with OOL and OHRM, should work to create a policy regarding the solicitation and hiring of subject matter experts (SME's). In particular, when an SME or employee is hired, there should be internal control measures in place to avoid a conflict or the appearance of a conflict regarding employees' relationships with employees, contractors, or SMEs.</p>	11/2/23

#	Case No.	Case Details	Recommendation(s)	Date Issued
6.	24-0048e	<p><b>Case Type:</b> Use of County Resources  <b>Agency/B/C:</b> DoE  <b>Subject:</b> Allegation that employee used County equipment for non-County work.  <b>Disposition:</b> Substantiated</p>	<ol style="list-style-type: none"> <li>1. The Respondent should be given a written Letter of Reprimand by the Department of the Environment Management. The Letter of Reprimand should detail the prohibited behavior committed by the Respondent. The Letter of Reprimand should state that any further violations by the Respondent could result in further disciplinary action, including fines and/or removal. Department of the Environment Management should consult with the Office of Human Resources Management on any additional appropriate discipline.</li> </ol>	2/26/24
7.	24-0091	<p><b>Case Type:</b> Operation Review  <b>Agency/B/C:</b> Fire/EMS Department  <b>Subject:</b> Allegation that County Fire/EMS official used the login credential of another employee to enter a Fire/EMS database and keep tabs on an employee.  <b>Disposition:</b> Substantiated</p>	<ol style="list-style-type: none"> <li>1. The Fire/EMS Department Internal Affairs Investigation, Case # 2023-009 be forwarded to the Office of Professional Standards, for review and appropriate action against the official;</li> <li>2. The official be required to take appropriate training regarding safeguards and the consequences of providing or the use of another person's passwords and should sign an affirmation that they have taken the training and agrees to follow the policy. If there is another violation regarding passwords, would be subject to the FIRE/EMS disciplinary policy.</li> <li>3. The Fire/EMS Department continues the policy to require Fire Department personnel to change or verify their password every thirty (30) days.</li> </ol>	2/26/24
8.	24-0146e	<p><b>Case Type:</b> Use of County Resources  <b>Agency/B/C:</b> DoE  <b>Subject:</b> Allegation that employees are taking dogs from the County shelter without following proper intake procedures so that the public does not get a chance to adopt the animals.  <b>Disposition:</b> Unsubstantiated</p>	<ol style="list-style-type: none"> <li>1. The Department of the Environment (DOE) and Animal Services Division (ASD) Management create and implement an official written policy regarding ASD employee rescue of animals from the animal shelter. The policy should specifically detail the procedures for all types of employee animal rescue (fostering and adopting). Further, employees should be required to sign and date the document confirming that they have read and understand the rules and protocols in place</li> </ol>	5/9/24

#	Case No.	Case Details	Recommendation(s)	Date Issued
9.	24-0156e/ 24-0174e	<p><b>Case Type:</b> Secondary Employment/Use of County Resources/ FWAI</p> <p><b>Agency/B/C:</b> DPWT</p> <p><b>Subject:</b> Allegation that DPWT employees are stealing time, changing time sheets to indicate they are working when they are not working. employee runs an outside secondary business and stores equipment from that business at a DPWT facility and an employee is working at an unauthorized secondary employment job and using County resources during County business hours.</p> <p><b>Disposition:</b> Partially substantiated</p>	<ol style="list-style-type: none"> <li>1. DPWT Management confer with the Office of Human Resources Management (OHRM) to determine appropriate discipline for employees as both committed violations of official timekeeping procedures.</li> <li>2. An employee immediately submits a Secondary Employment Request for approval.</li> <li>3. An employee should be counseled by DPWT Management on County policy regarding County employees attending school, and the use of County Resources and Official Time to attend school or conduct classwork.</li> <li>4. DPWT reviews and conducts mandatory official timekeeping training for all DPWT Management staff, to ensure proper accounting of official timekeeping procedures and records.</li> </ol>	6/20/24
10.	24-0203	<p><b>Case Type:</b> FWAI</p> <p><b>Agency/B/C:</b> OCS</p> <p><b>Subject:</b> Allegation that OCS manager lives out of state and is in violation of the Telework Agreement Policy (TAP) agreement.</p> <p><b>Disposition:</b> Unsubstantiated</p>	<ol style="list-style-type: none"> <li>1. That the Office of Human Resources Management (OHRM) consider a review of the TAP policy/agreements to determine whether to include some type of residency requirement (County, in-State, or within the District, Maryland or Virginia region) and its potential impact on County operations and staffing consistent with TAP policy.</li> </ol>	2/16/24

#	Case No.	Case Details	Recommendation(s)	Date Issued
11.	24-0263e	<p><b>Case Type:</b> Use of County Resources/FWAI</p> <p><b>Agency/B/C:</b> DPWT</p> <p><b>Subject:</b> Allegation that DPWT supervisor is using a County vehicle as their personal vehicle to drive from Brandywine shop to D'Arcy road shop daily and DPWT employee is filling gas cans at the D'Arcy road gas pumps and taking the gas cans home for personal use.</p> <p><b>Disposition:</b> Unsubstantiated</p>	<ol style="list-style-type: none"> <li>1. The Department of Public Works and Transportation (DPWT) and the Office of Information Technology (OIT) collaborate to ensure that all DPWT facility surveillance/security cameras are operational. Proper functionality of the surveillance/security cameras is paramount in County efforts to prevent the misuse/theft of County resources.</li> </ol>	9/6/24
12.	24-0264e	<p><b>Case Type:</b> Secondary Employment/Procurement/FWAI (Illegal Act)</p> <p><b>Agency/B/C:</b> PGC Housing Authority</p> <p><b>Subject:</b> PGCHA official is awarding contracts outside of established guidelines and <b>receiving</b> "kickbacks" for those contracts and working unauthorized secondary employment on County time.</p> <p><b>Disposition:</b> Partially substantiated</p>	<ol style="list-style-type: none"> <li>1. The official was required to file a current secondary employment form;</li> <li>2. Also be required to file FDS for 2023 with secondary employment information included; and</li> <li>3. The official must review and sign an affidavit stating that they are aware of the policy governing contracting and that any violation of contracting policy may result in discipline from the Agency and OHRM.</li> </ol>	4/11/24



#	Case No.	Case Details	Recommendation(s)	Date Issued
13.	24-0281e	<p><b>Case Type:</b> Use of County Resources  <b>Agency/B/C:</b> DoE  <b>Subject:</b> Allegation that management official used County employees for non-County work; not following proper procedures for awarding contracts; and allowed employees to hire family members.  <b>Disposition:</b> Unsubstantiated</p>	<ol style="list-style-type: none"> <li>1. OIT management reach out to their Appointing Authority and Office of Human Resources Management (OHRM), to obtain guidance regarding the appropriate work atmosphere in the agency under the County Personnel Code. Additionally, should reach out and request consultation regarding any internal personnel issues that require remediation.</li> <li>2. OIT management be counseled about issues related to their discussions with OIT employees and the executive team regarding personal matters and the creation of the potential appearance of favoritism in the agency.</li> </ol>	6/18/24
14.	24-0362	<p><b>Case Type:</b> Information Request/Operations Review  <b>Agency/B/C:</b> County Council  <b>Subject:</b> Alleged Abuse of Franking Privileges  <b>Disposition:</b> Unsubstantiated</p>	<ol style="list-style-type: none"> <li>1. The Council Administration reviews the Maryland General Assembly's Joint Committee of Legislative Ethics Guide (2024), in particular, Ethics Opinion #12 regarding Official Correspondence and Use of Resources, for potential best practices and policies to be implemented for Council franking privileges.</li> <li>2. The County Council Administrator consider implementing a County policy for the Legislative Branch to govern elected officials' use of franking privileges close to all elections.</li> </ol>	7/2/24
15.	24-0366	<p><b>Case Type:</b> Informal Opinion Request  <b>Agency/B/C:</b> OMB  <b>Subject:</b> Informal ethics advice request regarding travel programs.  <b>Disposition:</b> Advice Provided</p>	<ol style="list-style-type: none"> <li>1. OMB review Administrative Procedure 640 (Travel) to update to include a policy statement consistent with the State's Standard Travel Regulations under COMAR 23.02.01.03, in that officials and employees may accept promotional awards if they are obtained under the same conditions as those offered to the general public, are not provided by a prohibited source or donor, and that participation in such programs results in no additional cost to the County. This is consistent with the Section 2-293(f) language that it be generally available to the public and authorized by County regulation.</li> </ol>	5/24/24

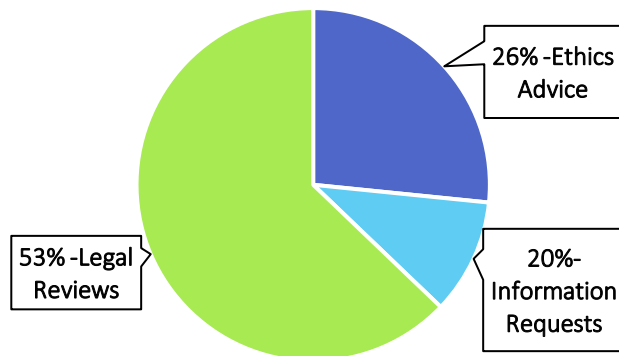
## Ethics Advice by the Office of Ethics and Accountability

The Office of Ethics and Accountability provides support to the Board in accordance with the Code of Ethics and Accountability, §2-303. The Office's Legal Counsel provides written and verbal advice to County officials, employees, agencies, and the public who seek advice regarding the application of the County's Code of Ethics.

The Office of Ethics and Accountability received a combined total of two hundred seventy-three (273) requests for Informal Ethics Advice, Legal Reviews, or Information Requests (including Maryland Public Information Act – MPIA requests) in Fiscal Year 2024. (145) involved legal reviews; (56) involved requests for information; and (72) involved informal ethics advice.

The informal ethics advice involved subject matter such as conflicts of interest; gifts/solicitation/fundraising; secondary employment; and Financial Disclosure Statements. Other Types of Informal Ethics Advice, include advice pertaining to post-employment, political activity, prestige of office, lobbying, honorarium, and other related matters.

FY2024 Informal Ethics Advice, Legal Reviews, and Information Requests



OEA Legal Counsel Bamidele “KiKi” Alexander (center) being recognized by Chief Administrative Officer Tara H. Jackson for Public Service Recognition Week – May 2024.

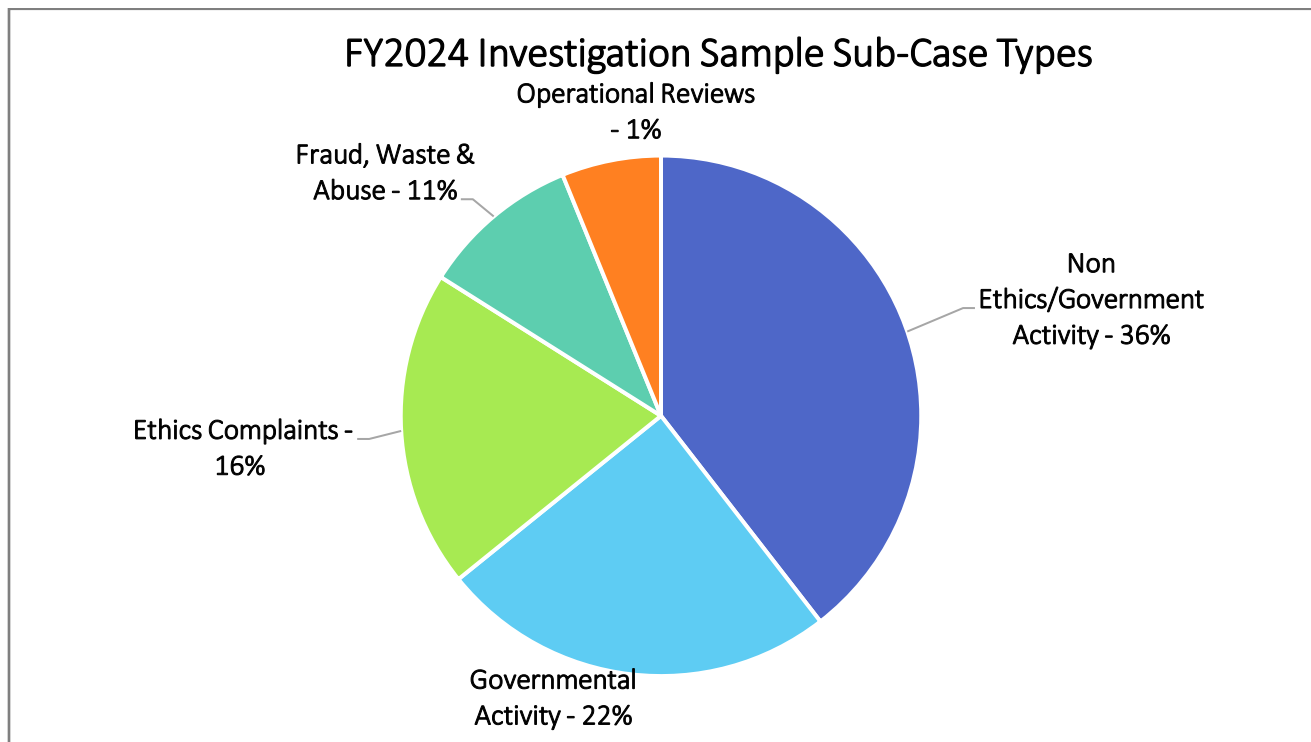
Photo Credit: Office of the County Executive

## FY 2024 Investigations

The Office of Ethics and Accountability is authorized pursuant to the County's Ethics Code, §2-303 to conduct criminal, civil, and administrative investigations; to provide information and evidence that relates to criminal acts to appropriate law enforcement officials; to initiate reviews of operations of County government as deemed appropriate; to investigate complaints from any source or upon its own initiative concerning alleged fraud, waste, abuse and service deficiencies; and to conduct joint investigations and projects with the Office of Audits and Investigations as well as other oversight, public safety or law enforcement agencies.

The Office of Ethics and Accountability does not prosecute criminal conduct. However, criminal conduct discovered by OEA during its investigation of a complaint or tip is referred to the appropriate prosecuting authority in accordance with the County's Ethics and Accountability Code. Moreover, the Office of Ethics and Accountability does not administer personnel matters or seek to resolve personnel conflicts that have existing procedures in place to address. Although allegations may be unsubstantiated, many of the investigations may result in the issuance of recommendations to Executive and Legislative branch leadership to address appearances of conflicts of interest, policy gaps, and operational deficiencies.

During Fiscal Year 2024, OEA conducted (118) investigations involving concerns with government activities (27), alleged fraud, waste, abuse, or illegal activity (14), ethics complaints (19), non-Ethics or Governmental referrals (43), and operational reviews (3). Investigations comprised percent (28%) of all case types, and the below chart displays additional investigation Sub-Case types.





Executive Director Turner and the OEA Team volunteering at Food & Friends for the Thanksgiving holiday – Nov. 2023.  
Photo Credit: Food & Friends



Executive Director Turner and the OEA Team Members at the Annual Women's History Month Luncheon – March 2024.



## Lobbyist Disclosures and Annual Reports

The Office of Ethics & Accountability reviewed all Lobbyists' 2023 Registration & Disclosure Forms and 2023 Annual Report Forms. In Calendar Year 2023, our Office processed three hundred eighty-four (384) registration forms and Annual Reports from eighty-four (84) total registered lobbyists or firms. As of July 2024, our Office has processed three hundred thirty (330) registration forms from seventy-one (71) total registered lobbyists or firms for Calendar Year 2024.

A list of lobbyists registered with the Office of Ethics and Accountability in calendar years 2023 and 2024 (as of Aug. 31) and their clients can be found on the OEA's website.

The following is the summary of Lobbyists' Annual Reports filed with the Board of Ethics for Calendar Year 2023. Total expenditures for 2023 lobbying activities were \$3,515,542. This is an approximately 66% increase from the 2022 total expenditures of \$2,113,483. The summary of sub-categories on the 2023 Lobbyists' Annual Reports is as follows:

Lobbying Activities	Total Expenditures
Total compensation paid to the lobbyist not including expenses reported under (B) through (I) below, salaries, compensations, or reimbursed expenses of the staff of the lobbyist:	\$3,475,084
Office expenses of the lobbyist not reported in (A):	\$955
Professional and technical research and assistance not reported in (A):	\$28,050
Publications which expressly encourage persons to communicate with Prince George's County officials or employees:	\$547
Fees and expenses paid to witnesses:	\$0
Meals and beverages for Prince George's County Officials or employees or their spouses or dependent children:	45\$
Special events in which all members of the Council or standing committee are invited:	\$7,029
Expenses for food, lodging, and entertainment of officials or employees for a meeting which was given in return for participation in a panel or speaking engagement at the meeting:	\$0
Other gifts to or for officials or employees or their spouses or their dependent children:	\$0
Other expenses:	\$3,832
Subtotal of A through F:	\$3,504,681
Subtotal of G through J:	\$10,861

